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March 13, 2020

APPLICATION GRANTED SO ORDERED A LANDERICK VERNON S. BRODERICK U.S.D.J. 3/16/2020

**VIA EMAIL** 

Hon. Vernon S. Broderick, U.S.D.J. Thurgood Marshall United States Courthouse 40 Foley Square, Room 415 New York, NY 10007

Re: In re Keurig Green Mountain Single-Serve Coffee Antitrust Litig., MDL No. 2542;

Master Docket No. 1:14-md-02542-VSB: Request to File Under Seal

Dear Judge Broderick:

I write on behalf of Keurig, and in accordance with Your Honor's Individual Rules & Practices in Civil Cases 1.A and 5.B to request leave to file under seal limited portions of Keurig's Memorandum of Law in Opposition to Plaintiffs' Motion and Objections to Magistrate Judge's Discovery Order and Exhibit 3 thereto, which contain certain confidential information.

Keurig makes this sealing request to protect its attorney-client privileged information, as well as the confidentiality interests of third parties. Moreover, the proposed redactions concern a privileged communication from Keurig's in-house counsel, as well as third-party documents designated as confidential under the Stipulated Amended Protective Order. Exhibit 3 is an internal business communication that Keurig has designated as "Highly Confidential" pursuant to the Stipulated Protective Order.

Keurig's proposed redactions are narrowly tailored to protect the asserted confidentiality of the subject matter at issue, and it requests that the Court permit the filing of these documents under seal.

Respectfully submitted,

/s/ Wendelynne J. Newton

Wendelynne J. Newton

cc: All counsel of record.